

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

PleasrDAO,

Plaintiff

v.

Martin Shkreli,

Defendant

Case No. 1-24-cv-04126-PKC-MMH

I, Martin Shkreli, hereby declare and state under penalty of perjury as follows:

1. I am the Defendant in the above-captioned action.
2. I submit this declaration in response to the Preliminary Injunction Order entered on August 26, 2024, which requires that I sequester and turn over all copies, in any form, of *Once Upon a Time in Shaolin* (the “Musical Work”) to defense counsel, and file an affidavit that I no longer possess any copies, in any form, of the Musical Work. ECF 30.
3. On August 23, 2024, my attorneys advised me that the Court ordered that I turn over all copies of the Musical Work to defense counsel.
4. On August 26, 2024, my attorneys advised me that the Court had issued a written order requiring that I “sequester and turn over” all copies, in any form, of the Musical Work to my attorneys. ECF 30.
5. I have searched my devices, electronic accounts, and other personal effects, and have identified the following copies of the Musical Work:

File Title	Location and Format
01 – Unknown Artist – Track 1.flac	Microsoft OneDrive, FLAC audio

02 – Unknown Artist – Track 2.flac	Microsoft OneDrive, FLAC audio
03 – Unknown Artist – Track 3.flac	Microsoft OneDrive, FLAC audio
04 – Unknown Artist – Track 4.flac	Microsoft OneDrive, FLAC audio
05 – Unknown Artist – Track 5.flac	Microsoft OneDrive, FLAC audio
06 – Unknown Artist – Track 6.flac	Microsoft OneDrive, FLAC audio
07 – Unknown Artist – Track 7.flac	Microsoft OneDrive, FLAC audio
08 – Unknown Artist – Track 8.flac	Microsoft OneDrive, FLAC audio
09 – Unknown Artist – Track 9.flac	Microsoft OneDrive, FLAC audio
10 – Unknown Artist – Track 10.flac	Microsoft OneDrive, FLAC audio
11 – Unknown Artist – Track 11.flac	Microsoft OneDrive, FLAC audio
12 – Unknown Artist – Track 12.flac	Microsoft OneDrive, FLAC audio
13 – Unknown Artist – Track 13.flac	Microsoft OneDrive, FLAC audio
14 – Unknown Artist – Track 14.flac	Microsoft OneDrive, FLAC audio
15 – Unknown Artist – Track 15.flac	Microsoft OneDrive, FLAC audio

6. Because of my recent time spent serving a criminal sentence, many of my personal effects were moved into storage. As a result, it is possible that I have been unable to exhaustively locate each and every copy of the Musical Work. In the event that I discover any additional copy of the Musical Work, I will promptly transfer said copy to my attorneys in the same manner as all other copies referenced here.

7. I transferred each of the copies identified in Paragraph 5 onto a USB stick, which I sent to my attorneys at the following address via hand delivery to:

Bochner PLLC
1040 Avenue of the Americas, 15th Floor
New York, NY 10018

8. I deleted each of the copies identified in Paragraph 5 from all of my electronic devices.

9. To the best of my knowledge, I do not have possession of any other copies of the Musical Work, in any form.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED on Aug 30, 2024

Martin Shkreli
box SIGN 4LR2RJQL189V7VZ6

Martin Shkreli